

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

_____ District of _____

_____ Division

Case No.

CV 20-00020

(to be filled in by the Clerk's Office)

U VAROV DENIS

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Immigration and Customs Enforcement
(ICE) of US Department of
Homeland Security

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

U VAROV DENIS

Street Address

Homeless

City and County

SAipan

State and Zip Code

CNMI 96950

Telephone Number

286 4015

E-mail Address

ugreban@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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Defendant No. 1

Name

Immigration and Customs Enforcement
(ICE) of US Department of Homeland
SecurityJob or Title *(if known)*

Street Address

500 12th Street SW

City and County

Washington D.C., USA

State and Zip Code

Washington D.C. 20536

Telephone Number

E-mail Address *(if known)*

Defendant No. 2

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 3

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

Defendant No. 4

Name

Job or Title *(if known)*

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address *(if known)*

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question ☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* UVAROV DENIS, is a citizen of the
State of *(name)* RUSSIAN Federation.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Immigration and Customs Enforcement is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.
 Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Defendant since June 7, 2018 confiscated my passport, never did any effort in good faith to organize asylum interview. When I needed to go home Defendant was not able to return my passport. ICE violated international 1967 Protocol on Refugee Rights and caused a lot of mental harm, depression and deprivation.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Please look at the attached N1

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

- 1 - Return my Russian passport immediately
- 2 - Apologies
- 3 - Compensation of harms plus punitive damage of \$80,000

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney *PRO SE*

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 08.14.2020

Signature of Plaintiff

Uvarov

Printed Name of Plaintiff

UVAROV DENIS

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Attachments. No 1.

Honorable Court, I had to fly from Russia to CNMI on November 29, 2017.

I addressed to the local office of ICE of DHS for political asylum. While waiting for proceedings my plans have changed. I do not want to an asylum applicant anymore.

I informed of my wish to go home on July 10, 2010. For the whole month I cannot get my passport back. The passport had been taken by ICE illegally because it is my identity document and this is Russian government property.

I addressed LA asylum Office – the Federal level of DHS/ICE but nobody has given back my passport. ICE is limiting my movement, making my travel outside CNMI impossible.

I need United States District Court to oblige ICE to return my passport.

I demand \$ 80000 as compensation for my sufferings plus punitive damage.

No 2. My communication with Los Angeles Asylum office

Cancel asylum  

Денис Уваров

Thu, Jul 2, 3:03 PM

My name is Denis Uvarov. I am currently in removal proceedings under INA 212 (a)(7)(A)(i)(I). file number 216-121-005. I am kindly requesting cancel this process

ZLA APSO NONDETAINED <zlaapsonondetained@uscis.dhs.gov>

Wed, Jul 3, 4:55 AM

to me *

Good afternoon,

Please report to your ICE Officer to inform them of your request. The Guam office has your passport.

Thank you.

Non-Detained APSO Unit

Los Angeles Asylum Office (ZLA)

Refugee, Asylum, and International Operations

14101 Myford Rd., Tustin, CA 92780

Office: (714) 368-5700

Email: zlaapsonondetained@uscis.dhs.gov

Close case  

Денис Уваров <uvarovden@gmail.com>

Tue, Jul 28, 8:53 PM

to Los *

My name is Denis Uvarov. I am currently in removal proceedings under INA 212 (a)(7)(A)(i)(I). file number 216-121-005. I am kindly requesting cancel this process. I need only get back my passport and leave this country."

Did you receive my paper letter with form G-684?

When you will finish administrative procedure and send me all documents?

ICE does not give my passport until I bring documents from you. I need these documents as soon as possible

ZLA APSO NONDETAINED

Sat, Aug 1, 1:50 AM (10 days ago)

to ZLA me *

Good Morning,

The Los Angeles Asylum Office has received your multiple requests for a dissolution interview and request to have your passport returned. Our office does not physically have your passport at this time. Before this document can be returned to you a dissolution interview would need to be completed. At this time we do not have a projected date to schedule this interview. We will continue to keep your request on our radar and email you if and when this can be scheduled.

Many Thanks,